

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: David and Lisa Moore §
Debtor(s). § Bankruptcy Case No. 10-40579-H1-12

**AGREED EMERGENCY MOTION TO CANCEL ALL HEARINGS ON
FEBRUARY 10, 2014 (DKT Nos. 134 and 139)**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THIS MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THIS MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

On February 5, 2014, the parties have reached an agreement in principle the details of which have not yet been worked out that will dispose of all matters between the Debtors and Ms. Bushman. The agreement will provide for the satisfaction of all claims between the parties and the transfer of the Debtors' homestead to Ms. Bushman. The negotiations will also include auxiliary issues such as claims against the Debtor's daughter.

The Debtors and Ms. Bushman asks the Court to cancel the February 10, 2014 hearings in this case to allow them to finish the negotiations and work out the details. It is desired that a new hearing not be set as the first act necessary to implement the

settlement will be for the Debtor's to file a motion to modify their Chapter 12 Plan which would also serve as a motion to compromise.

Debtor's counsel has emailed a copy of this Motion Mr. Tonkin, counsel for Ms. Bushman who has responded by authorizing the filing of this Motion.

Respectfully Submitted,

2/6/14
Date

/s/ Alexander B. Wathen
Alexander B. Wathen
Attorney for Debtor(s)
Texas Bar No. 24005122
S.D. Tex. No. 22793
13280 Northwest Freeway, Suite F352
Houston, TX 77040
Ph. (281) 999-9025
Fax (281) 616-6242
wathenecf@gmail.com

CERTIFICATE OF SERVICE

I certify that on February 6, 2014, or at the very latest the next day after the document was filed, I have or am contemporaneously serving a copy of these documents with all attachments on those entities listed below either by first class mail or through the Clerk by electronic mail.

2/6/14
Date

/s/ Alexander B. Wathen
Alexander B. Wathen

BY ELECTRONIC MEANS THROUGH THE CLERK OR BY FIRST CLASS MAIL:

Ronald H. Tonkin, by email for Ms. Bushman

David G. Peake, Chapter 12 Trustee